

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

| | | |
|---------------------------------|---|--|
| UNITED STATES OF AMERICA | : | CRIMINAL NO. _____ |
| v. | : | DATE FILED: _____ |
| MUHAMMAD ALEEM WARE | : | VIOLATIONS: |
| a/k/a "Mu," | : | 18 U.S.C. § 371 (conspiracy – 1 count) |
| a/k/a "Moo," | : | 18 U.S.C §§ 922(a)(1)(A), 924(a)(1)(D) |
| HANEEF VAUGHN | : | (dealing in firearms without a license – 1 |
| a/k/a "Haneef Ameen Vaughn- | : | count) |
| Wilson," | : | Notice of forfeiture |
| a/k/a "Hanef Vaughn," | : | |
| a/k/a "Neef," | : | |
| JABREEL VAUGHN | : | |
| a/k/a "Breel," | : | |
| a/k/a "Breely" | : | |

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

At all times material to this indictment:

1. Defendant MUHAMMAD WARE was a resident of South Carolina, was not a federal firearms licensee ("FFL"), and was not authorized to deal, import, or manufacture firearms under federal law.
2. Defendant HANEEF VAUGHN was a resident of Pennsylvania, was not an FFL, and was not authorized to deal, import, or manufacture firearms under federal law.
3. Defendant JABREEL VAUGHN was a resident of Pennsylvania, was not an FFL, and was not authorized to deal, import, or manufacture firearms under federal law.
4. Elite Firearms, LLC, in Myrtle Beach, South Carolina, possessed an FFL

and was authorized to deal in firearms under federal laws.

5. Bass Pro Shops Outdoor World #017, in Myrtle Beach, South Carolina, possessed an FFL and was authorized to deal in firearms under federal laws.

6. Dick's Pawn Shop West, in Myrtle Beach, South Carolina, possessed an FFL and was authorized to deal in firearms under federal laws.

7. FFL holders are licensed, among other things, to sell firearms. Various rules and regulations, promulgated under the authority of Chapter 44, Title 18, United States Code, govern the manner in which FFL holders are permitted to sell firearms.

8. The rules and regulations governing FFL holders require that a person seeking to purchase a firearm fill out a Firearm Transaction Record, ATF Form 4473 ("Form 4473"). Part of the Form 4473 requires that the prospective purchaser certify that all his or her answers on Form 4473 are true and correct. The buyer is required to include his or her home address. Also, a portion of the Form 4473 requires that the prospective purchaser certify truthfully, subject to penalties of perjury, that he or she is the actual buyer of the firearm. The Form 4473 contains the following language in bold type: **"Warning: You are not the actual transferee/buyer if you are acquiring the firearm(s) on behalf of another person. If you are not the actual transferee/buyer, the licensee cannot transfer the firearm(s) to you."** In the certification section of the Form 4473, the actual buyer must certify that his or her answers to the questions on the form are "true, correct, and complete," and acknowledge by his or her signature that "making any false oral or written statement . . . is a crime punishable as a felony under Federal law, and may also violate State and/or local law."

9. FFL holders are required to maintain a record, in the form of a completed

Form 4473, of the identity of the actual buyer of firearms sold by the FFL holder, to ensure that the person was not prohibited from purchasing a firearm.

10. A person who purchases a firearm at the behest of another person and falsely states on the Form 4473 that he or she is the actual buyer of the firearm is known as a “straw purchaser.”

11. From on or about May 1, 2020 through on or about November 30, 2020, in the Eastern District of Pennsylvania, the District of South Carolina, and elsewhere, defendants

MUHAMMAD ALEEM WARE,
a/k/a “Mu,”
a/k/a “Moo,”
HANEEF VAUGHN,
a/k/a “Haneef Ameen Vaughn-Wilson,”
a/k/a “Hanef Vaughn,”
a/k/a “Neef,” and
JABREEL VAUGHN,
a/k/a “Breel,”
a/k/a “Breely,”

conspired and agreed together and with others, known and unknown to the grand jury, to commit offenses against the United States, that is, to make a false statement with respect to the information required to be kept in the records of a federally licensed firearms dealer, in violation of Title 18, United States Code, Section 924(a)(1)(A); and to engage in the business of dealing in firearms without being licensed to do so, in violation of Title 18, United States Code, Section 922(a)(1)(A).

MANNER AND MEANS

It was part of the conspiracy that:

12. Defendant MUHAMMAD WARE solicited and received requests to purchase firearms from defendants HANEEF VAUGHN and JABREEL VAUGHN, and others known and unknown to the grand jury.

13. Defendant MUHAMMAD WARE purchased firearms from federally licensed firearms dealers in South Carolina, knowing that the firearms were to be transported to Philadelphia for resale to defendants HANEEF VAUGHN and JABREEL VAUGHN, and others known and unknown to the grand jury.

14. Defendant MUHAMMAD WARE falsely stated on the Form 4473 for each firearm purchase that he was the actual purchaser of the firearms, when in fact defendant WARE knew this statement was false and he planned to sell the firearms for profit.

15. Defendant MUHAMMAD WARE traveled from South Carolina, at times with others, known and unknown to the grand jury, to the Eastern District of Pennsylvania, to deliver firearms to defendants HANEEF VAUGHN and JABREEL VAUGHN, and others known to the grand jury, who then sold and assisted defendant WARE in the sale of the firearms to others for profit.

OVERT ACTS

In furtherance of the conspiracy and to accomplish its objects, the following overt acts, among others, were committed in the Eastern District of Pennsylvania, the District of South Carolina, and elsewhere:

1. From at least on or about May 9, 2020 to on or about May 19, 2020:
 - a. Defendant MUHAMMAD WARE purchased the following five firearms from Elite Firearms, LLC in Myrtle Beach, South Carolina: a Glock, Model G26, 9mm

semi-automatic pistol, bearing serial number ACXF072; a Glock, Model 19, 9mm semi-automatic pistol, bearing serial number BNED385; a Ruger, Model Security 9, 9mm semi-automatic pistol, bearing serial number 38212185; a Glock, Model 45, 9mm semi-automatic pistol, bearing serial number BMFC372; and a Taurus, Model G2S, 9mm semi-automatic pistol, bearing serial number ADD474957, to sell to others, known and unknown to the grand jury.

b. When purchasing the firearms, defendant MUHAMMAD WARE falsely stated on the Forms 4473 that he was the actual purchaser of the firearms, when in fact defendant WARE knew this was false and he planned to sell the firearms for profit.

c. Defendant MUHAMMAD WARE discussed the price, purchase, and delivery of firearms with Person #1, a person known to the grand jury, and others unknown to the grand jury.

d. Defendant MUHAMMAD WARE also exchanged text messages with defendant JABREEL VAUGHN about the pending sale of firearms by defendant WARE to Person #1, during which defendant JABREEL VAUGHN confirmed that Person #1 was "legit."

e. Defendant MUHAMMAD WARE traveled with the firearms he purchased to the Eastern District of Pennsylvania where he met with Person #1 and sold him four of the firearms.

2. From at least on or about June 10, 2020 to on or about June 27, 2020:

a. Defendant MUHAMMAD WARE purchased the following five firearms from Elite Firearms, LLC in Myrtle Beach, South Carolina: a FN, Model 503, 9mm semi-automatic pistol, bearing serial number CV004160; a CZ, Model P-10C, 9mm semi-automatic pistol, bearing serial number D240699; a Glock, Model G44, .22 caliber semi-

automatic pistol, bearing serial number AEHR169; a CZ, Model P-10F, 9mm semi-automatic pistol, bearing serial number D121909; and a FN, Model FNX9, 9mm semi-automatic pistol, bearing serial number FX1U030651, to sell to others, known and unknown to the grand jury.

b. When purchasing the firearms, defendant MUHAMMAD WARE falsely stated on the Forms 4473 that he was the actual purchaser of the firearms, when in fact defendant WARE knew this statement was false and he planned to sell the firearms for profit.

c. Defendant MUHAMMAD WARE discussed the price, purchase, and delivery of firearms with defendant JABREEL VAUGHN, and others known and unknown to the grand jury.

d. Defendant MUHAMMAD WARE traveled with the purchased firearms to the Eastern District of Pennsylvania where he met with defendant JABREEL VAUGHN and sold defendant JABREEL VAUGHN four firearms. Defendant WARE also met with a person known to the grand jury and sold him one firearm.

3. From at least on or about June 29, 2020 to on or about July 4, 2020:

a. Defendant MUHAMMAD WARE purchased the following eight firearms from Elite Firearms, LLC in Myrtle Beach, South Carolina: a Springfield, Model XDM, 9mm semi-automatic pistol, bearing serial number BY176035; a Smith & Wesson, Model M&P Shield, 9mm semi-automatic pistol, bearing serial number JET7825; a Springfield, Model Hellcat, 9mm semi-automatic pistol, bearing serial number BY188669; a CZ, Model 75, 9mm semi-automatic pistol, bearing serial number C727680; a FN, Model 509T, 9mm semi-automatic pistol, bearing serial number GKS0101830; a Springfield, Model Hellcat, 9mm semi-automatic pistol, bearing serial number BY188697; a Springfield, Model Hellcat, 9mm semi-automatic

pistol, bearing serial number BY253309; and a Springfield, Model Hellcat, 9mm semi-automatic pistol, bearing serial number BY188678, to sell to others, known and unknown to the grand jury.

b. When purchasing the firearms, defendant MUHAMMAD WARE falsely stated on the Forms 4473 that he was the actual purchaser of the firearms, when in fact defendant WARE knew this statement was false and he planned to sell the firearms for profit.

c. Defendant MUHAMMAD WARE discussed the price, purchase, and delivery of firearms with defendants JABREEL VAUGHN and HANEEF VAUGHN, and others known and unknown to the grand jury.

d. Defendant MUHAMMAD WARE traveled with the purchased firearms to the Eastern District of Pennsylvania where he met with defendant JABREEL VAUGHN and sold him four of the firearms. Defendant WARE also met with defendant HANEEF VAUGHN and Person #2 and sold them two of the firearms. Defendant WARE also met with others known to the grand jury and sold them two of the firearms.

4. From at least on or about July 6, 2020 to on or about July 12, 2020:

a. Defendant MUHAMMAD WARE purchased the following eleven firearms from Elite Firearms, LLC in Myrtle Beach, South Carolina: a Zastava, Model ZPAP, 5.56x45 semi-automatic rifle, bearing serial number Z85-008985; a Springfield, Model XDE, 9mm semi-automatic pistol, bearing serial number AT203313; a Springfield, Model Hellcat, 9mm semi-automatic pistol, bearing serial number BY168901; a Walther, Model PPS M2, 9mm semi-automatic pistol, bearing serial number AA2114; a Glock, Model 22, .40 caliber semi-automatic pistol, bearing serial number AERB147; a CZ, Model P-07, 9mm semi-automatic pistol, bearing serial number C912625; a Taurus, Model G2C, 9mm semi-automatic pistol,

bearing serial number ABG641916; a Taurus, Model G2C, 9mm semi-automatic pistol, bearing serial number ABG641611; a Glock, Model G40, 10mm semi-automatic pistol, bearing serial number BNTR712; a Sig Sauer, Model P320, 9mm semi-automatic pistol, bearing serial number 58C050926; and a Canik, Model TP9SF, 9mm semi-automatic pistol, bearing serial number T647Z-20BC21061, to sell to others, known and unknown to the grand jury.

b. When purchasing the firearms, defendant MUHAMMAD WARE falsely stated on the Form 4473 that he was the actual purchaser of the firearms, when in fact defendant WARE knew this statement to be false and he planned to sell the firearms for profit.

c. Defendant MUHAMMAD WARE discussed the price, purchase, and delivery of firearms with defendants JABREEL VAUGHN and HANEEF VAUGHN, and others known and unknown to the grand jury.

d. Defendant HANEEF VAUGHN told defendant MUHAMMAD WARE that Person #2 wanted to purchase the Zastava, Model ZPAP, 5.56x45 semi-automatic rifle, bearing serial number Z85-008985.

e. Defendant MUHAMMAD WARE traveled with the purchased firearms to the Eastern District of Pennsylvania where he met with defendant JABREEL VAUGHN and sold him eight of the firearms. Defendant WARE also met with defendant HANEEF VAUGHN and sold him one of the firearms. Defendant WARE also met with a person known to the grand jury and sold him two of the firearms.

5. From at least on or about July 17, 2020 to at least on or about July 18, 2020:

a. Defendant MUHAMMAD WARE purchased the following three firearms from Elite Firearms, LLC in Myrtle Beach, South Carolina: a Tisas-Trabzon, Model ZIG M1911, .45 caliber semi-automatic pistol, bearing serial number T-0620-20Z08239; a Sig Sauer, Model P320, 9mm semi-automatic pistol, bearing serial number M18-085629; and a Sig Sauer, Model P320, 9mm semi-automatic pistol, bearing serial number M18-085631, to sell to others, known and unknown to the grand jury.

b. When purchasing the firearms, defendant MUHAMMAD WARE falsely stated on the Form 4473 that he was the actual purchaser of the firearms, when in fact defendant WARE knew this statement was false and he planned to sell the firearms for profit.

c. Defendant MUHAMMAD WARE discussed the price, purchase, and delivery of firearms with defendant JABREEL VAUGHN, and others known and unknown to the grand jury.

d. Defendant MUHAMMAD WARE traveled with the purchased firearms to the Eastern District of Pennsylvania where he met with defendant JABREEL VAUGHN and sold him the firearms.

6. From at least on or about July 21, 2020 to on or about July 24, 2020:

a. Defendant MUHAMMAD WARE purchased the following ten firearms from Elite Firearms, LLC in Myrtle Beach, South Carolina: a Smith & Wesson, Model Shield, 9mm semi-automatic pistol, bearing serial number JEX1477; a Glock, Model G44, .22LR semi-automatic pistol bearing serial number AELY226; a Smith & Wesson, Model M&P 20, .45 caliber semi-automatic pistol, bearing serial number NAV0247; a Taurus, Model G2S, 9mm semi-automatic pistol, bearing serial number TMS99059; an EAA, Model EA9L, 9mm semi-

automatic pistol, bearing serial number BAAD1526; a FN, Model FNK9, 9mm semi-automatic pistol, bearing serial number FX1U03631; a CZ, Model 75B, 9mm semi-automatic pistol, bearing serial number D257215; a Girsan, Model MC28SAT, 9mm semi-automatic pistol, bearing serial number T6368-20AV01480; a Smith & Wesson, Model M&P 2.0, 9mm semi-automatic pistol, bearing serial number NBY2316; and a Smith & Wesson, Model M&P 2.0, 9mm semi-automatic pistol, bearing serial number NCE4941, to sell to others, known and unknown to the grand jury.

b. When purchasing the firearms, defendant MUHAMMAD WARE falsely stated on the Forms 4473 that he was the actual purchaser of the firearms, when in fact defendant WARE knew this statement was false and he planned to sell the firearms for profit.

c. Defendant MUHAMMAD WARE discussed the price, purchase, and delivery of firearms with defendant JABREEL VAUGHN, and others known and unknown to the grand jury.

d. Defendant MUHAMMAD WARE traveled with the purchased firearms to the Eastern District of Pennsylvania where he met with defendant JABREEL VAUGHN and sold him six of the firearms. Defendant WARE also met with a person known to the grand jury and sold him four of the firearms.

7. From at least on or about August 24, 2020 to on or about August 25, 2020:

a. Defendant MUHAMMAD WARE purchased the following five firearms from Elite Firearms, LLC in Myrtle Beach, South Carolina: a Canik, Model TP9DA, 9mm semi-automatic pistol, bearing serial number 20BJ04984; a Canik, Model TP9DA, 9mm semi-automatic pistol, bearing serial number 20BJ04982; a Canik, Model TP9DA, 9mm semi-

automatic pistol, bearing serial number 20BJ04981; a Canik, Model TP9DA, 9mm semi-automatic pistol, bearing serial number 20BJ05117; and a CZ, Model P01, 9mm semi-automatic pistol, bearing serial number D312591, to sell to others, known and unknown to the grand jury.

b. When purchasing the firearms, defendant MUHAMMAD WARE falsely stated on the Form 4473 that he was the actual purchaser of the firearms, when in fact defendant WARE knew this statement was false and planned to sell the firearms for profit.

c. Defendant MUHAMMAD WARE discussed the price, purchase, and delivery of firearms with defendant HANEEF VAUGHN.

d. Defendant MUHAMMAD WARE traveled with the purchased firearms to the Eastern District of Pennsylvania where he met with defendant HANEEF VAUGHN and sold him the firearms.

8. From at least on or about August 27, 2020 to on or about September 2, 2020:

a. Defendant MUHAMMAD WARE purchased the following four firearms from Elite Firearms, LLC in Myrtle Beach, South Carolina: a Glock, Model 43, 9mm semi-automatic pistol, bearing serial number AEUK984; a Smith & Wesson, Model M&P, .40 caliber semi-automatic pistol, bearing serial number NBP6697; a H&K, Model VP9, 9mm semi-automatic pistol, bearing serial number 224-290930; and a SAR Arms, Model SAR-9, 9mm semi-automatic pistol, bearing serial number T1102-20BV59300, to sell to others, known and unknown to the grand jury.

b. Defendant MUHAMMAD WARE purchased the following four firearms from Bass Pro Shops Outdoor World #017 in Myrtle Beach, South Carolina: a Glock,

Model 19 Gen 4, 9mm semi-automatic pistol, bearing serial number ACTH751; a FN, Model 509, 9mm semi-automatic pistol, bearing serial number GKS0089983; a Glock, Model 19 Gen 4, 9mm semi-automatic pistol, bearing serial number ACTH773; and a Glock, Model 19 Gen 4, 9mm semi-automatic pistol, bearing serial number ACTH752, to sell to others, known and unknown to the grand jury.

c. When purchasing the firearms, defendant MUHAMMAD WARE falsely stated on the Forms 4473 that he was the actual purchaser of the firearms, when in fact defendant WARE knew this statement was false and he planned to sell the firearms for profit.

d. Defendant MUHAMMAD WARE discussed the price, purchase, and delivery of firearms with defendant HANEEF VAUGHN.

e. Defendant MUHAMMAD WARE traveled with the purchased firearms to the Eastern District of Pennsylvania where he met with defendant HANEEF VAUGHN and sold him the firearms.

9. From at least on or about September 8, 2020 to on or about September 9, 2020:

a. Defendant MUHAMMAD WARE purchased the following four firearms from Bass Pro Shops Outdoor World #017 in Myrtle Beach, South Carolina: a FN, Model 509, 9mm semi-automatic pistol, bearing serial number GKS0112673; a FN, Model 509, 9mm semi-automatic pistol, bearing serial number GKS0114228; a Springfield, Model XDS-2, .45 caliber semi-automatic pistol, bearing serial number HG147435; and a Smith & Wesson, Model M&P M2.0, 9mm semi-automatic pistol, bearing serial number NHC9668, to sell to others, known and unknown to the grand jury.

b. When purchasing the firearms, defendant MUHAMMAD WARE falsely stated on the Forms 4473 that he was the actual purchaser of the firearms, when in fact defendant WARE knew this statement was false and planned to sell the firearms for profit.

c. Defendant MUHAMMAD WARE discussed the price, purchase, and delivery of firearms with defendant HANEEF VAUGHN, and others known and unknown to the grand jury.

d. Defendant MUHAMMAD WARE traveled with the purchased firearms to the Eastern District of Pennsylvania where he met with defendant HANEEF VAUGHN and sold him the firearms.

10. From at least on or about September 23, 2020 to on or about October 2, 2020:

a. Defendant MUHAMMAD WARE purchased the following seven firearms from Elite Firearms, LLC in Myrtle Beach, South Carolina: a Glock, Model G19, 9mm semi-automatic pistol, bearing serial number KSE450; a Glock, Model G19, 9mm semi-automatic pistol, bearing serial number BPXG807; a Glock, Model G19, 9mm semi-automatic pistol, bearing serial number BRBB337; a Glock, Model G19, 9mm semi-automatic pistol, bearing serial number BPXS031; a Glock, Model Gen 5 G17, 9mm semi-automatic pistol, bearing serial number BRDE447; a Glock, Model Gen 5 G17, 9mm semi-automatic pistol, bearing serial number BRDE363; and a Ruger, Model 57, 9mm semi-automatic pistol, bearing serial number 641-60201 to sell to others, known and unknown to the grand jury.

b. When purchasing the firearm, defendant MUHAMMAD WARE falsely stated on the Forms 4473 that he was the actual purchaser of the firearms, when in fact defendant WARE knew this statement was false and planned to sell the firearms for profit.

c. Defendant MUHAMMAD WARE discussed the price, purchase, and delivery of firearms with defendant HANEEF VAUGHN and Person #3, a person known to the grand jury.

d. Defendant MUHAMMAD WARE traveled with the purchased firearms to the Eastern District of Pennsylvania where he met with Person #3 and sold him the firearms.

11. From at least on or about October 21, 2020 to on or about October 24, 2020:

a. Defendant MUHAMMAD WARE purchased the following four firearms from Dick's Pawn Shop West in Myrtle Beach, South Carolina: a Glock, Model 19, 9mm semi-automatic pistol, bearing serial number BRGF681; a Glock, Model 19 Gen 5, 9mm semi-automatic pistol, bearing serial number BRFT 834; a Glock, Model 48, 9mm semi-automatic pistol, bearing serial number AESZ729; and a Smith & Wesson, Model M&P 40, .40 caliber semi-automatic pistol, bearing serial number NAJ801 to sell to others, known and unknown to the grand jury.

b. When purchasing the firearms, defendant MUHAMMAD WARE falsely stated on the Form 4473 that he was the actual purchaser of the firearms, when in fact defendant WARE knew this statement was false and he planned to sell the firearms for profit.

c. Defendant MUHAMMAD WARE discussed the price, purchase, and delivery of firearms with defendant HANEEF VAUGHN, and others known and unknown to the grand jury.

d. Defendant MUHAMMAD WARE traveled with the purchased firearms to the Eastern District of Pennsylvania where he met with defendant HANEEF VAUGHN and sold him the firearms.

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

At all times material to this indictment:

1. Paragraphs 1, 12 through 15, and Overt Acts 1 through 11 of Count One are incorporated here.
2. From on or about May 1, 2020 through on or about November 30, 2020, in the Eastern District of Pennsylvania, and elsewhere, defendant

MUHAMMAD ALEEM WARE,
a/k/a "Mu,"
a/k/a "Moo,"

willfully engaged in the business of dealing in firearms without being licensed to do so under the provisions of Chapter 44, Title 18, United States Code.

In violation of Title 18, United States Code, Sections 922(a)(1)(A) and 924(a)(1)(D).

NOTICE OF FORFEITURE**THE GRAND JURY FURTHER CHARGES THAT:**

As a result of the violation of Title 18, United States Code, Sections 371, 924(a)(1)(A), 922(a)(1)(A), and 924(a)(1)(D) set forth in this indictment, defendants

MUHAMMAD ALEEM WARE,
a/k/a "Mu,"
a/k/a "Moo,"
HANEEF VAUGHN,
a/k/a "Haneef Ameen Vaughn-
Wilson,"
a/k/a "Hanef Vaughn,"
a/k/a "Neef," and
JABREEL VAUGHN,
a/k/a "Breel,"
a/k/a "Breely,"

shall forfeit to the United States of America the firearms involved in the commission of such violations, including, but not limited to, the firearms listed in the chart below.

| | FFL Location | Firearm | Serial Number |
|---|---------------------|--|----------------------|
| 1 | Elite Firearms, LLC | Glock, Model G26, 9mm semi-automatic pistol | ACXF072 |
| 2 | Elite Firearms, LLC | Glock, Model 19, 9mm semi-automatic pistol | BNED385 |
| 3 | Elite Firearms, LLC | Ruger, Model Security 9, 9mm semi-automatic pistol | 38212185 |
| 4 | Elite Firearms, LLC | Glock, Model 45, 9mm semi-automatic pistol | BMFC372 |
| 5 | Elite Firearms, LLC | Taurus, Model G2S, 9mm semi-automatic pistol | ADD474957 |
| 6 | Elite Firearms, LLC | FN, Model 503, 9mm semi-automatic pistol | CV004160 |
| 7 | Elite Firearms, LLC | FN, Model FNX9, 9mm semi-automatic pistol | FX1U030651 |
| 8 | Elite Firearms, LLC | CZ, Model P-10C, 9mm semi-automatic pistol | D240699 |

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| 9 | Elite Firearms, LLC | Glock, Model G44, .22 caliber semi-automatic pistol | AEHR169 |
| 10 | Elite Firearms, LLC | CZ, Model P-10 F, 9mm semi-automatic pistol | D121909 |
| 11 | Elite Firearms, LLC | Springfield, Model XDM, 9mm semi-automatic pistol | BY176035 |
| 12 | Elite Firearms, LLC | Smith & Wesson, Model M&P Shield, 9mm semi-automatic pistol | JET7825 |
| 13 | Elite Firearms, LLC | Springfield, Model Hellcat, 9mm semi-automatic pistol | BY188669 |
| 14 | Elite Firearms, LLC | CZ, Model 75, 9mm semi-automatic pistol | C727680 |
| 15 | Elite Firearms, LLC | Springfield, Model Hellcat, 9mm semi-automatic pistol | BY253309 |
| 16 | Elite Firearms, LLC | FN, Model 509T, 9mm semi-automatic pistol | GKS0101830 |
| 17 | Elite Firearms, LLC | Springfield, Model Hellcat, 9mm semi-automatic pistol | BY188697 |
| 18 | Elite Firearms, LLC | Springfield, Model Hellcat, 9mm semi-automatic pistol | BY188678 |
| 19 | Elite Firearms, LLC | Zastava, Model ZPAP, 5.56x45 semi-automatic rifle | Z85-008985 |
| 20 | Elite Firearms, LLC | Sig Sauer, Model P320, 9mm semi-automatic pistol | 58C050926 |
| 21 | Elite Firearms, LLC | Canik, Model TP9SF, 9mm semi-automatic pistol | T647Z-20BC21061 |
| 22 | Elite Firearms, LLC | Springfield, Model XDE, 9mm semi-automatic pistol | AT203313 |
| 23 | Elite Firearms, LLC | Springfield, Model Hellcat, 9mm semi-automatic pistol | BY168901 |
| 24 | Elite Firearms, LLC | Walther, Model PPS M2, 9mm semi-automatic pistol | AA2114 |
| 25 | Elite Firearms, LLC | Glock, Model G22, .40 caliber semi-automatic pistol | AERB147 |
| 26 | Elite Firearms, LLC | CZ, Model P-07, 9mm semi-automatic pistol | C912625 |

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| 27 | Elite Firearms, LLC | Taurus, Model G2C, 9mm semi-automatic pistol | ABG641916 |
| 28 | Elite Firearms, LLC | Taurus, Model G2C, 9mm semi-automatic pistol | ABG641611 |
| 29 | Elite Firearms, LLC | Glock, Model G40, 10mm semi-automatic pistol | BNTR712/71Z |
| 30 | Elite Firearms, LLC | Tisas-Trabzon, Model ZIG M1911, .45 caliber semi-automatic pistol | T-0620-20Z08239 |
| 31 | Elite Firearms, LLC | Sig Sauer, Model P320, 9mm semi-automatic pistol | M18-085629 |
| 32 | Elite Firearms, LLC | Sig Sauer, Model P320, 9mm semi-automatic pistol | M18-085631 |
| 33 | Elite Firearms, LLC | Smith & Wesson, Model Shield, 9mm semi-automatic pistol | JEX1477 |
| 34 | Elite Firearms, LLC | Glock, Model G44, .22LR caliber semi-automatic pistol | AELY226 |
| 35 | Elite Firearms, LLC | Smith & Wesson, Model M&P 20, .45 caliber semi-automatic pistol | NAV0247 |
| 36 | Elite Firearms, LLC | Taurus, Model G2S, 9mm semi-automatic pistol | TMS99059 |
| 37 | Elite Firearms, LLC | EAA, Model EA9L, 9mm semi-automatic pistol | BAAD1526 |
| 38 | Elite Firearms, LLC | FN, Model FNK9, 9mm semi-automatic pistol | FX1U03631 |
| 39 | Elite Firearms, LLC | CZ, Model 75B, 9mm semi-automatic pistol | D257215 |
| 40 | Elite Firearms, LLC | Girsan, Model MC28SAT, 9mm semi-automatic pistol | T6368-20AV01480 |
| 41 | Elite Firearms, LLC | Smith & Wesson, Model M&P 2.0, 9mm semi-automatic pistol | NBY2316 |
| 42 | Elite Firearms, LLC | Smith & Wesson, Model M&P 2.0, 9mm semi-automatic pistol | NCE4941 |
| 43 | Elite Firearms, LLC | Smith & Wesson, Model M&P9, 9mm semi-automatic pistol | NCD4892 |

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| 44 | Elite Firearms, LLC | Mossberg, Model MC1SC, 9mm semi-automatic pistol | 028148CP |
| 45 | Elite Firearms, LLC | CZ, Model P07, 9mm semi-automatic pistol | D321895 |
| 46 | Elite Firearms, LLC | SAR, Model P85, 9mm semi-automatic pistol | 20M50374 |
| 47 | Elite Firearms, LLC | FN, Model Five Seven, 5.7x28 semi-automatic pistol | 386393224 |
| 48 | Elite Firearms, LLC | Century, Model NAK9, 9mm semi-automatic pistol | RDN2044837 |
| 49 | Elite Firearms, LLC | Taurus, Model G3C, 9mm semi-automatic pistol | ABG654096 |
| 50 | Elite Firearms, LLC | Smith & Wesson, Model M&P Shield, .40 caliber semi-automatic pistol | JEY2250 |
| 51 | Elite Firearms, LLC | Smith & Wesson, Model M&P Shield, 9mm semi-automatic pistol | N/A |
| 52 | Elite Firearms, LLC | CZ, Model P-07, 9mm semi-automatic pistol | D285576 |
| 53 | Elite Firearms, LLC | CZ, Model P-10F, 9mm semi-automatic pistol | D136694 |
| 54 | Elite Firearms, LLC | CZ, Model 7BB, 9mm semi-automatic pistol | D137544 |
| 55 | Elite Firearms, LLC | CZ, Model 5D1, 9mm semi-automatic pistol | D328602 |
| 56 | Elite Firearms, LLC | CZ, Model P-01, 9mm semi-automatic pistol | D327360 |
| 57 | Elite Firearms, LLC | CZ, Model 97BD, .45ACP semi-automatic pistol | D217626 |
| 58 | Elite Firearms, LLC | SCCY, Model CPX-2, 9mm semi-automatic pistol | 948766 |
| 59 | Elite Firearms, LLC | SCCY, Model CPX-2, 9mm semi-automatic pistol | 948765 |
| 60 | Elite Firearms, LLC | CZ, Model 75B, 9mm semi-automatic pistol | CCCP3583 |
| 61 | Elite Firearms, LLC | CZ, Model 75B, 9mm semi-automatic pistol | CCCP3142 |

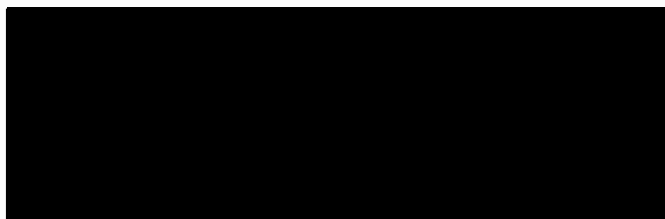
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| 62 | Elite Firearms, LLC | Canik, Model TP9SFX, 9mm semi-automatic pistol | 20BC33352 |
| 63 | Elite Firearms, LLC | CZ, Model 75SP-01, 9mm semi-automatic pistol | D116122 |
| 64 | Elite Firearms, LLC | CZ, Model P10S, 9mm semi-automatic pistol | C923093 |
| 65 | Elite Firearms, LLC | CZ, Model P10S, 9mm semi-automatic pistol | C923109 |
| 66 | Elite Firearms, LLC | CZ, Model P10S, 9mm semi-automatic pistol | C903097 |
| 67 | Elite Firearms, LLC | CZ, Model P10S, 9mm semi-automatic pistol | C891482 |
| 68 | Elite Firearms, LLC | CZ, Model P10S, 9mm semi-automatic pistol | C931091 |
| 69 | Bass Pro Shops | Glock, Model 30, .45 caliber semi-automatic pistol | BNKZ249 |
| 70 | Bass Pro Shops | Glock, Model 43, 9mm semi-automatic pistol | AESX161 |
| 71 | Bass Pro Shops | Glock, Model 43, 9mm semi-automatic pistol | AESX160 |
| 72 | Bass Pro Shops | Glock, Model 43, 9mm semi-automatic pistol | AESX162 |
| 73 | 707 Gun Shop | Glock, Model 31 Gen 4, .357 caliber semi-automatic pistol | BGDC693 |
| 74 | Elite Firearms, LLC | Canik, Model TP9DA, 9mm semi-automatic pistol | 20BJ04984 |
| 75 | Elite Firearms, LLC | Canik, Model TP9DA, 9mm semi-automatic pistol | 20BJ04982 |
| 76 | Elite Firearms, LLC | Canik, Model TP9DA, 9mm semi-automatic pistol | 20BJ04981 |
| 77 | Elite Firearms, LLC | Canik, Model TP9DA, 9mm semi-automatic pistol | 20BJ05117 |
| 78 | Elite Firearms, LLC | CZ, Model P01, 9mm semi-automatic pistol | D312591 |
| 79 | Elite Firearms, LLC | Glock, Model 43, 9mm semi-automatic pistol | AEUK984 |


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| 80 | Elite Firearms, LLC | Smith & Wesson, Model M&P, .40 caliber semi-automatic pistol | NBP6697 |
| 81 | Elite Firearms, LLC | H&K, Model VP9, 9mm semi-automatic pistol | 224-290930 |
| 82 | Elite Firearms, LLC | SAR Arms, Model SAR-9, 9mm semi-automatic pistol | T1102-20BV59300 |
| 83 | Bass Pro Shops | Glock, Model 19 Gen 4, 9mm semi-automatic pistol | ACTH751 |
| 84 | Bass Pro Shops | FN, Model 509, 9mm semi-automatic pistol | GKS0089983 |
| 85 | Bass Pro Shops | Glock, Model 19 Gen 4, 9mm semi-automatic pistol | ACTH773 |
| 86 | Bass Pro Shops | Glock, Model 19 Gen 4, 9mm semi-automatic pistol | ACTH752 |
| 87 | Bass Pro Shops | FN, Model 509, 9mm semi-automatic pistol | GKS0112673 |
| 88 | Bass Pro Shops | FN, Model 509, 9mm semi-automatic pistol | GKS0114228 |
| 89 | Bass Pro Shops | HS/Springfield, Model XDS-2, .45 caliber semi-automatic pistol | HG147435 |
| 90 | Bass Pro Shops | Smith & Wesson, Model M&P M2.0, 9mm semi-automatic pistol | NHC9668 |
| 91 | Elite Firearms, LLC | Glock, Model G19, 9mm semi-automatic pistol | KSE450 |
| 92 | Elite Firearms, LLC | Glock, Model G19, 9mm semi-automatic pistol | BPXG807 |
| 93 | Elite Firearms, LLC | Glock, Model G19, 9mm semi-automatic pistol | BRBB337 |
| 94 | Elite Firearms, LLC | Glock, Model G19, 9mm semi-automatic pistol | BPXS031 |
| 95 | Elite Firearms, LLC | Glock, Model Gen 5 G17, 9mm semi-automatic pistol | BRDE447 |
| 96 | Elite Firearms, LLC | Glock, Model Gen 5 G17, 9mm semi-automatic pistol | BRDE363 |
| 97 | Elite Firearms, LLC | Ruger, Model 57, 9mm semi-automatic pistol | 641-60201 |

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| 98 | Elite Firearms, LLC | Glock, Model 19, 9mm semi-automatic pistol | BRFR575 |
| 99 | Dicks Pawn West | Glock, Model 19, 9mm semi-automatic pistol | BRGF681 |
| 100 | Dicks Pawn West | Glock, Model 19 Gen 5, 9mm semi-automatic pistol | BRFT834 |
| 101 | Dicks Pawn West | Glock, Model 48, 9mm semi-automatic pistol | AESZ729 |
| 102 | Dicks Pawn West | Smith & Wesson, Model M&P 40, .40 caliber semi-automatic pistol | NAJ801 |

All pursuant to Title 28, United States Code, Section 2461(c) and Title 18, United States Code, Section 924(d).

A TRUE BILL:




JENNIFER ARBITTIER WILLIAMS
 United States Attorney

No. _____

UNITED STATES DISTRICT COURT

Eastern District of Pennsylvania

Criminal Division

THE UNITED STATES OF AMERICA

vs.

MUHAMMAD ALEEM WARE

a/k/a "Mu,"

a/k/a "Moo,"

HANEEF VAUGHN

a/k/a "Haneef Ameen Vaughn-Wilson,"

a/k/a "Haneef Vaughn,"

a/k/a "Neef,"

JABREEL VAUGHN

a/k/a "Breel,"

a/k/a "Breely

INDICTMENT

Counts

18 U.S.C. § 371 (conspiracy – 1 count)

18 U.S.C §§ 922(a)(1)(A), 924(a)(1)(D) (dealing in firearms without a license – 1 count)

Notice of forfeiture

Filed in open court this _____ day,
Of _____ A.D. 20 _____

Clerk

Bail, \$ _____